AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Ohio

United States of America
v.
Robert E. Wilson II

Defendant(s)

Case No. 2:17-mj-264

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 05/01/2017 in the county of Franklin in the Southern District of Ohio, the defendant(s) violated:

Code Section	*Offense Description*
18 USC 922(g)(1)	Felon in Possession of a Firearm
21 USC 841(a)(1)	Possession with intent to distribute - Heroin

This criminal complaint is based on these facts:

SEE ATTACHED

☑ Continued on the attached sheet.

Complainant's signature

James Bajus Special Agent ATF

Printed name and title

Sworn to before me and signed in my presence.

Date: 5/10/17

Judge's signature

City and state: Columbus OH

US Magistrate Judge Terance P Kemp

Printed name and title

PROBABLE CAUSE AFFIDAVIT
Robert E. Wilson II

I, James Bajus, being duly sworn, depose and state that:

1. I have been a Special Agent with the United States Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) since June 2007. Your affiant is a graduate of the ATF National Academy Special Agent Basic Training and Federal Law Enforcement Training Center Criminal Investigator Training Program. As a result of my training and experience as an ATF Special Agent, I am familiar with Federal criminal laws.

2. On or about November 26th, 1997, Robert E. WILSON II (hereinafter WILSON) plead guilty to one count of Felonious Assault, a crime punishable by more than one year in prison, (criminal Case Number 97CR005780) in the Franklin County, Ohio Court of Common Pleas.

3. On or about August 24th, 2006, WILSON plead guilty to one count of Felon in Possession of a Firearm, (Criminal Case Number: 2:05CR261) in the Southern Judicial District of Ohio.

4. On or about July 11th, 2012 WILSON plead guilty to one count of Possession of Drugs, a crime punishable by more than one year in prison, (criminal Case Number 10CR003652) in the Franklin County, Ohio Court of Common Pleas.

5. On or about May 1st, 2017, Columbus Police Officers observed a gold Chevrolet Tahoe OH tag E340235 parked on the Marathon Gas station lot located at 1102 West Mound St. Officers previously made several narcotic and firearms arrests on the lot. Officers observed a male in the driver's seat later identified as WILSON and a female in the front passenger seat later identified as Megan COTTER. The Chevrolet Tahoe is registered to COTTER.

6. The vehicle drove off the gas station lot and proceeded onto Mound St. The vehicle took several quick turns leading the officers to believe that the occupant of the vehicle was attempting to flee. On Vaughn St. the vehicle pulled into a parking spot and WILSON the driver and lone occupant abruptly jumped from the vehicle running north. Officers pursued on foot.

7. Officers observed WILSON drop something between the buildings of 1803 and 1799 Mound Street. One of the officers retrieved the dropped items and recognized it as a bag with large amount of suspected crack cocaine and another bag with suspected heroin.

8. Officers were able to detain WILSON at 630 Larcomb Ave. Officers following the path that WILSON took found a third bag. This bag contained suspect crack cocaine and was found in the driveway of 630 Larcomb Ave.

9. During a search of the Tahoe Tag E340235 Officers found a Tarus 9mm PT92 handgun serial# TSK38674. The firearm had been reported stolen Columbus Police report #150148035. The handgun was laying in between the driver's seat and the center console. The handgun was directly accessible and visible to WILSON when he was driving the Tahoe.

PROBABLE CAUSE AFFIDAVIT
Robert E. Wilson II

10. WILSON was found to have a valid warrant for his arrest Franklin County Municipal Court #2016CRA002162 for Drug Possession (F5). WILSON did not have a valid OH driver's license and was driving under several suspensions.

11. Officers at scene weighted the suspected crack cocaine at (32) thirty-two grams and the suspected heroin at (29) twenty-nine grams.

12. After being read his rights WILSON stated that he ran because he was "riding dirty". When asked if that meant he was riding with a gun and narcotics in his vehicle WILSON stated yes.

13. It was determined that the aforementioned firearm seized from WILSON on or about May 1st, 2017 was NOT manufactured in the State of Ohio and therefore travelled in interstate commerce to reach the State of Ohio.

14. The aforementioned offenses occurred in Franklin County, Ohio, in the Southern Judicial District of Ohio.

15. Based on this information, your affiant believes probable cause exists that WILSON possessed a firearm after having been convicted of a crime punishable by more than one-year incarceration, in violation of 18 U.S.C. 922(g)(1).

16. Based on this information, your affiant believes probable cause exists that WILSON possessed heroin with intent to distribute, in violation of 21 U.S.C. 841(a)(1).

James Bajus
Special Agent ATF

Sworn to and subscribed before me this 10th day of May, 2017, at Columbus, Ohio.

Terence P. Kemp
U.S. MAGISTRATE JUDGE